



State of Ohio Environmental Protection Agency

Central District Office

P.O. Box 1049, 1800 WaterMark Dr.

Columbus, Ohio 43266-0149

US EPA RECORDS CENTER REGION 5



501563



May 9, 1988

RE: GRANVILLE SOLVENTS, INC.

LICKING COUNTY

OHDO004495412/01-45-0310

Richard F. Celeste  
Governor

Mr. John Reeb  
Granville Solvents, Inc.  
P.O. Box 95  
Granville, Ohio 43023

RECEIVED

JUL 13 1988

OFFICE OF RCRA  
Waste Management Division  
U.S. EPA, REGION V

Dear Mr. Reeb:

Thank you for accompanying Mr. Adelsberger and myself during the RCRA compliance inspection on May 4, 1988 at the Granville Solvents, Inc. (GSI) facility in Granville, Ohio. The GSI facility was inspected for compliance with Ohio and Federal EPA regulations pertaining to off-site hazardous waste storage facilities and transporters of hazardous wastes.

Regarding the operating status of the facility, it should be noted that on August 15, 1986 GSI ceased operation under an order from the Licking County Court of Common Pleas. As a result no management of hazardous waste (except container and tank inspections) have been allowed on site since this time. Recently an amendment to the order was filed which allowed GSI to ship some wastes off site to an approved TSD facility. The amendment includes certain notification requirements as well as documentation demonstrating the final disposition of hazardous waste in an approved TSD facility.

The following is a description of the deficiencies in the GSI operation which were noted during the inspection:

OAC 3745-50-58(A)/40 CFR 270.30(a): The GSI Part A Permit indicates that 5,000 gallons (100 drums) of hazardous waste may be stored on site for more than 90 days. At present there are over 300 drums on site and according to the 1987 waste inventory 260 + drums may be classified as hazardous waste. The inventory was performed by Ohio EPA with GSI assistance in February, 1987. The inventory was accomplished through examination of GSI's operating records and not by laboratory analysis. All these drums have been on site since at least August 15, 1986.

OAC 3745-65-13(A)(1)(2)/40 CFR 265.13(a)(1)(2): This rule requires a detailed chemical and physical analysis of hazardous wastes be performed which contains all the information which must be known to treat, store and dispose of the waste material. The 1987 waste inventory indicates several drums contain "unkown" materials.

OAC 3745-65-13(B)/40 CFR 265.13(b): This rule requires the waste analysis plan be kept at the facility. The plan was not available at the facility during the inspection.

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OAC 3745-65-14(A)(B)/40 CFR 265.14(a)(b): This rule requires that the owner/operator prevent unauthorized entry to the active portion of the facility. In GSI's case a fence is used. The fence is in a state of disrepair. The fence at the front, eastern end of the facility is broken and there is a 4 square foot hole in the area where the elevated portion of the facility slopes down to the natural grade. This hole may not have been noticed during earlier inspections due to the thick vegetation which covered the opening at that time. The barbed wire added to the top of the fence does not extend around the entire facility. The barbed wire which was damaged when the three fell on the fence should be repaired.

Preventing entry to this facility is critical due to the close proximity of the facility to the bike path and to the Village of Granville residents (across the street). In addition, there still exists an open excavation on the west end of the facility in which partially excavated tanks have man-way lids which are not bolted down. The lids can be easily moved off the openings to obtain access to the tanks. The tanks still contain hazardous wastes.

Furthermore around the north side of the facility are many empty drums stacked four high and miscellaneous equipment laying about the premises. Inside the building are aging drums, many in an advanced state of decay. During the inspection 6 leaking drums were noted. One drum's lid rusted completely through and dropped a few inches into the drum before encountering the waste stored inside. Many of these decaying and leaking drums are stacked 3 drums high.

OAC 3745-65-15(B)(2)(4)/40 CFR 265.15(b)(2)(4): This rule requires the inspection plan be maintained at the facility. The plan was not available during the inspection. Inspection records indicate that since May, 1987 there were eight periods of time ranging in length from 9 to 17 days when inspections were not conducted. Weekly inspections should be conducted.

OAC 3745-65-16(D)(4)/40 CFR 265.16(d)(4): This rule requires annual training be conducted and documented in facility files. Although Mr. Reeb attended training conferences in the past year, documentation of such training was not available during the inspection.

OAC 3745-65-31/40 CFR 265.31: This rule requires that the facility be operated and maintained to minimize the possibility of sudden or non-sudden release of hazardous waste or hazardous constituents to the environment. The deficiencies (aforementioned and to follow) with respect to site security, fire protection, leaking drums and aged underground storage tanks demonstrate that this rule is not being followed.

OAC 3745-65-32/40 CFR 265.32: This rule requires that facilities be equipped with a telephone for summoning emergency assistance, portable fire extinguishers and water of adequate volume to fight fire. During the inspection it was noted that the water and telephone were disconnected and that one fire extinguisher was missing and the other two had not been checked since May and June of 1985.

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OAC 3745-65-33/40 CFR 265.33: The inspection tags on the fire extinguishers indicated that they were last tested/recharged in May and June of 1985. It therefore appears that 3 years have passed since the extinguishers were tested.

The telephone used to alert emergency authorities has been disconnected and not maintained as required by this rule.

OAC 3745-65-34/40 CFR 265.34: This rule requires emergency communication for an employee on-site to summon off-site emergency services. The telephone has been disconnected.

OAC 3745-65-35/40 CFR 265.35: Aisle space by the office is still a problem. Drums are stacked 3 high and two wide against the office wall. This rule requires aisle space be maintained to allow unobstructed movement of emergency equipment.

OAC 3745-65-54(C)(E)/40CFR 265.54(c)(e): The Contingency Plan available during the inspection was the plan used before the facility ceased operation in 1986. The plan has not been revised to reflect the present operational status of the facility and the reduced ability of the GSI employee to detect a problem and summon emergency services.

OAC 3745-65-73(B)(5)/40 CFR 265.73(b)(5): This rule requires records of inspections be kept according to the appropriate frequencies, in GSI's case weekly inspections of tanks and container storage areas. The GSI inspection records reflect that eight periods occurred in the past year where 9 to 17 days passed between inspections.

OAC 3745-65-75: Ohio EPA has no record of an annual facility report being received from GSI. Mr. Reeb indicated during the inspection that he believed he did not submit one for 1987.

OAC 3745-66-13(B)/40 CFR 265.113(b): The partial closure of GSI was to be completed by February 1, 1986. To date the closure is less than 50 percent complete. No closure activities have been conducted since August, 1986 when GSI ceased operation under the Licking County Court Order.

40 CFR 265.112(d)(3): This federal rule requires a closure plan be submitted to the Administrator 15 days after the termination of interim status. On July 17, 1987 U.S. EPA denied GSI's Interim Status permit and required GSI to submit a Closure Plan. To date no closure plan has been submitted to U.S. EPA.

OAC 3745-66-71/40 CFR 265.171: Since GSI ceased operation, the condition of many drums has deteriorated. Mr. Reeb indicated he has redrummed one drum due to a leak and 6 other drums were noted during the inspection to have leaks. Another drum had its lid rust through and drop a few inches into the drum. The physical strength of many of the drums is questionable which is of great concern since most of the drums are stacked 3 drums high.

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OAC 3745-66-74/40 CFR 265.174: In the past year eight periods of time which ranged in length from 9 to 17 days passed where no inspections were recorded. Due to the increasing deterioration of the drums, weekly inspections are increasingly important.

OAC 3745-66-76/40 CFR 265.176: This rule requires a 50 feet wide buffer between ignitable wastes and the facility property line. The ignitable waste at GSI are approximately 35 feet from the street right-of-way in front of the facility.

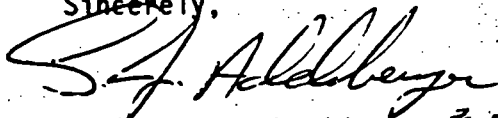
40 CFR 265.191(a)(b): This rule requires that the owner or operator of a tank system without secondary containment obtain a written assessment (in accordance with this rule) of the tank system's integrity by January 12, 1988. No such assessment was performed.

OAC 3745-66-94(E)/40 CFR 265.194: This rule requires at least weekly inspections of the tank area to detect leaks and signs of deterioration. Records indicate that in the past year there were eight periods ranging in length from 9 to 17 days where no inspections were recorded.

OAC 3745-66-97/40 CFR 265.197(a): Closure of the tanks began in August, 1985. However the tanks remaining in the ground still contain hazardous waste. This rule requires that at closure the tanks and equipment be emptied and decontaminated. While the excavated tanks (outside the facility) are empty it is unknown as to whether they were decontaminated.

Due to the legal status of the GSI facility this information is being forwarded to the Central Office Enforcement Section and the Ohio Attorney General's Office. The violations noted above should be corrected as soon as possible. The Ohio EPA inspection form is enclosed. In addition, the U.S. EPA Land Disposal Restriction (LDR) form is enclosed. If you have any questions you may contact Mr. Lundy Adelsberger at (614) 644-2055.

Sincerely,



William M. Schneider *WMS*  
Division of Solid & Hazardous Waste Management  
Central District Office

WMS/sc

Enclosures

cc: Dave Sholtis, DSHWM, CO  
Brad Tamaro, AGO

0016m/15-18

May 3, 1988/9:00 AM

Date and Time of Inspection

**RCRA INTERIM STATUS INSPECTION FORM**

HWFAB # 01-45-0310

**GENERAL INFORMATION**

U.S. EPA I.D. # OH0004495412

Facility: Granville Solvents, Inc. Address: Palmer Lane, P.O. Box 95 City: Granville  
State: Ohio Zip Code: 43023 County: Licking Telephone: (614) 268-0916 (Americlean Sys.)

**INSPECTION PARTICIPANT(S)**

	(Name)	(Title)	(Telephone)
1.	<u>John Reeb</u>	<u>Owner/Operator</u>	<u>(614) 268-0916</u>
2.	<u></u>	<u></u>	<u></u>
3.	<u></u>	<u></u>	<u></u>

**INSPECTOR(S)**

1.	<u>William Schneider</u>	<u>Environmental Engineer</u>	<u>(614) 644-2055</u>
2.	<u>Lundy Adelsberger</u>	<u>Group Leader</u>	<u>(614) 644-2055</u>
3.	<u></u>	<u></u>	<u></u>

**INSTALLATION ACTIVITY**

Mark One

If the site is a TSDF, check the boxes indicating which areas were reviewed.

☐ Generator only (G)

☐ Transporter (T)

☐ TSDF only

☐ G-T

☐ G-TSDF

☐ T-TSDF

☒ G-T-TSDF

☒ General Facility Standards, Preparedness  
and Prevention, Contingency and Emergency  
Manifests/Records/Reporting, Closure

☒ Containers S01

☒ Tanks S02/T01

☐ Surface Impoundments S04/T02

☐ Incineration/Thermal Treatment

☐ Waste Piles S03

☐ Land Treatment D01

☐ Landfills D00

☐ Chemical/Physical/  
Biological T04

☐ Groundwater Monitoring

☐ Post-Closure

**RCRA INTERIM STATUS INSPECTION FORM**

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has the facility submitted a Part A to Ohio?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>
2. If "yes", is it complete and accurate?	<u>    </u>	<u>X</u>	<u>    </u>	<u>No. 1</u>
3. Has the facility submitted a Part B?	<u>    </u>	<u>X</u>	<u>    </u>	<u>    </u>
4. Was advance notice of the inspection given? If so, how far in advance?	<u>X</u>	<u>    </u>	<u>    </u>	<u>3 Weeks</u>

IF THE SITE HAS RECEIVED A PART B PERMIT, USE THE RCRA STATUS INSPECTION FORM.

**REMARKS, GENERAL INFORMATION**

Include a brief description of site activity and waste handling.

1. The GSI Hazardous Waste Permit allow 5,000 gallons (100 drums) of storage in containers. Presently there are over 300 drums in the GSI Facility. While some may contain non-hazardous waste materials, based on the waste inventory from 1987 the majority (260+) are hazardous wastes.

Site Activity: Granville Solvents, Inc. (GSI) operated as a G - T - TSD until August 15, 1986 when a preliminary injunction became effective requiring GSI to comply with OEPA requirements or shut down. Operations ceased on 8/15/86. Since then only inspection by Mr. Reeb were allowed and use of his office to conduct business. No other actions have been initiated to date by the AGO. U.S. EPA has denied the GSI Federal Permit and is requiring closure.

Waste On Site: Refer to the waste inventory performed on 2/25/87 by OEPA.

# RCRA INTERIM STATUS INSPECTION FORM

## 40 CFR 262 (OAC 3745-52) GENERATOR REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The hazardous waste(s) generated at this facility have been tested or are acknowledged to be hazardous waste(s) as defined in Section 261 and in compliance with the requirements of Sections 262.11. [3745-52-11(D)]	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
2. Does this facility generate any hazardous wastes that are excluded from regulation under Section 261.4 [3745-51-04] (statutory exclusions) or Section 261.6 [3745-51-06(A)(1)] (recycle/reuse)?	<u>      </u>	<u>X</u>	<u>      </u>	<u>      </u>
3. Does this facility have waste or waste treatment equipment that is excluded from regulation because of totally enclosed treatment (Section 265.1(c)(9)) [3745-65-01] or via operation of an elementary neutralization unit and/or wastewater treatment unit (Section 265.1(c)(10) [3745-65-01]	<u>      </u>	<u>X</u>	<u>      </u>	<u>      </u>
4. The generator meets the following requirements with respect to the preparation, use and retention of the hazardous waste manifest:				
a) The manifest form used contains all of the information required by Section 262.21(a) and (b) [3745-52-21] and the minimum number of copies required by Section 262.22 [3745-52-22].	<u>      </u>	<u>      </u>	<u>X</u>	<u>No. 1</u>
b) The generator has designated at least one permitted disposal facility and has/will designate an alternate facility or instructions to return waste in compliance with Section 262.20 [3745-52-20(B)(C)(D)].	<u>      </u>	<u>      </u>	<u>X</u>	<u>No. 1</u>
c) Prepared manifests have been signed by the generator and initial transporter in compliance with Section 262.23 [3745-52-23(A)(1 and 2)].	<u>      </u>	<u>      </u>	<u>X</u>	<u>No. 1</u>
d) The generator has complied with manifest exception reporting requirements (investigate after 35 days, report after 45 days) in Section 262.42(a)(b) [3745-52-42].	<u>      </u>	<u>      </u>	<u>X</u>	<u>No. 1</u>
e) Signed copies of all hazardous waste manifests and any documentation required for Exception Reports are retained for at least 3 years as required by Section 262.40 [3745-52-40]. (262.40(a)) [3745-52-40(a)]	<u>      </u>	<u>      </u>	<u>X</u>	<u>No. 1</u>

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
5. The generator meets the following hazardous waste pre-transport requirements:				
a) Prior to offering hazardous wastes for transport off-site the waste material is packaged, labeled and marked in accord with applicable DOT regulations (Section 262.30, 262.31 and 262.32(a)) [3745-52-30, 3745-52-31, 3745-52-32]	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
b) Prior to offering hazardous wastes for transport off-site each container with a capacity of 110 gallons (416 liters) <u>or less</u> is affixed with a completed hazardous waste label as required by Section 262.32(b) [3745-52-32].	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
c) The generator meets requirements for properly placarding or offering to properly placard the initial transporter of the waste material in compliance with Section 262.33 [3745-52-33].	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
6. Hazardous wastes imported from or exported to foreign countries are handled in accordance with the requirements of Section 262.50 [3745-52-50]	<u>      </u>	<u>      </u>	<u>X</u>	<u>      </u>
7. If the generator elects to store hazardous waste on-site in <u>containers</u> or <u>tanks</u> for <u>90 days</u> or less without a RCRA storage permit as provided under Section 262.34 [3745-52-34], the following requirements with respect to such storage are met:				
a) The containers are clearly marked with the words "Hazardous Waste".	<u>      </u>	<u>      </u>	<u>X</u>	<u>      </u>
b) The date that accumulation began is clearly marked on each container.	<u>      </u>	<u>      </u>	<u>X</u>	<u>      </u>
8. The generator has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) [3745-65-16(A)(B)(C)] including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. (Section 262.34) [3745-52-34(A)(4)]	<u>      </u>	<u>X</u>	<u>      </u>	<u>No. 2</u>
9. The generator keeps all of the records required by Section 265.16(d)(e) [3745-65-16(D)(E)] including written job titles, job descriptions and documented employee training records (Section 262.34) [3745-52-34(A)(4)].	<u>      </u>	<u>X</u>	<u>      </u>	<u>No. 2</u>



RCRA INTERIM STATUS INSPECTION FORM

NOTE: SHORT-TERM STORAGE FOR 90 DAYS OR LESS IN TANKS AND CONTAINERS ALSO REQUIRES THAT REGULATIONS IN SECTION 265 [3745-65], SUBPARTS C AND D (PREPAREDNESS AND PREVENTION PLUS CONTINGENCY AND EMERGENCY) AND CERTAIN PORTIONS OF THE "CONTAINERS" AND "TANKS" RULES BE MET. COMPLETE THE APPROPRIATE SECTIONS OF THE INSPECTION FORM.

REMARKS, GENERATOR REQUIREMENTS

1. Since no manifests have been used since August, 1986, no new manifests were available to inspect.
2. See OAC 3745-65-16, General Facility Standards Section.

# RCRA INTERIM STATUS INSPECTION FORM

## 40 CFR 263 (OAC 3745-53) TRANSPORTER REQUIREMENTS

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The entity has registered with the Public Utilities Commission of Ohio as a transporter of hazardous waste. [3745-53-11]	<u>      </u>	<u>  X  </u>	<u>      </u>	<u>No. 1</u>
2. The transporter has accepted hazardous wastes for transport only when the waste was accompanied by a manifest prepared by the generator in accordance with Section 262 [3745-53-20(A)]	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>No. 1</u>
3. The transporter has signed the manifest as required by Section 263.20(b) [3745-53-20(B)] and has carried the manifest with the waste shipment as required by Section 263.20(c) [3745-53-20(C)].	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>No. 1</u>
4. Upon delivery of the hazardous waste to the next transporter or the designated facility, the transporter has signed the manifest as required in Section 263.20(d) [3745-53-20(D)(1)] and has retained a signed copy (available for inspection) for at least 3 years (263.22(a)) [3745-53-22(A)].	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>No. 1</u>
5. The transporter has delivered the entire quantity of hazardous waste accepted from the generator in accordance with manifest instructions; in cases where this was not possible the transporter has contacted the generator for further instructions and revised the manifest accordingly (263.21) [3745-53-21(A)(B)].	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>No. 1</u>
6. If hazardous waste has been delivered to rail transporters or water transporters, the original transporter has complied with the manifest handling requirements of Section 263.20(e)(f) [3745-53-20(E)(F)].	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>No. 1</u>
7. If hazardous waste has been shipped out of the country, the transporter has retained signed copies of the manifest (available for inspection for at least 3 years) indicating that the waste left the U.S.A. (263.22(c) [3745-53-22(D)]).	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>No. 1</u>
8. Has the transporter ever had a discharge of hazardous waste during time that the waste was under his control?	<u>      </u>	<u>  X  </u>	<u>      </u>	<u>      </u>
a) Was immediate action taken? (Notify authorities, dike discharge) (263.30(a)) [3745-53-30(A)]	<u>      </u>	<u>      </u>	<u>  X  </u>	<u>      </u>

RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
b) Were all of the notifications required by Section 263.30(c)(d) [3745-53-20(C)] made?	<u>      </u>	<u>      </u>	<u>X</u>	<u>      </u>
c) Was the discharge cleaned up as required by Section 263.13 [3745-53-31]?	<u>      </u>	<u>      </u>	<u>X</u>	<u>      </u>
9. Does the transporter store hazardous waste temporarily while they are in transit?	<u>X</u>	<u>      </u>	<u>      </u>	<u>No. 2</u>
a) Manifested wastes are stored for 10 days or less ("Transfer Facility") and remain properly DOT-packaged during storage (263.12) [3745-53-12]	<u>X</u>	<u>      </u>	<u>      </u>	<u>No. 2</u>
<b><u>NOTE:</u></b> TEMPORARY STORAGE IN STATIONARY TANKS IS NOT PERMITTED UNDER TRANSFER FACILITY REQUIREMENTS AND SUCH STORAGE REQUIRES A RCRA PERMIT APPLICATION AND IS SUBJECT TO INTERIM STATUS REQUIREMENTS FOR STORAGE FACILITIES. ANY TYPE OF STORAGE BY THE TRANSPORTER WHICH IS NOT SPECIFICALLY AUTHORIZED UNDER SECTION 263.12 [3745-53-12], TRANSFER FACILITY REQUIREMENTS, IS SUBJECT TO FULL RCRA REGULATION.				
10. Does the transporter import hazardous waste into the United States?	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>
11. Does the transporter mix hazardous wastes of different U.S. DOT shipping descriptions by placing them into a single container?	<u>      </u>	<u>      </u>	<u>      </u>	<u>      </u>

**NOTE:** A TRANSPORTER THAT IMPORTS HAZARDOUS WASTES OR MIXES WASTES AS DEFINED IN SECTION 263.10(c) [3745-53-10(C)] BECOMES A GENERATOR AND IS SUBJECT TO THE REQUIREMENTS OF SECTION 262 [3745-52].

REMARKS, TRANSPORTER REQUIREMENTS

1. GSI no longer transports hazardous waste. The transporter license and insurance have not been renewed according to Mr. Reeb.
2. GSI is a TSD (storage) facility.

# RCRA INTERIM STATUS INSPECTION FORM

## 40 CFR 265 (OAC 3745-65-et seq.) GENERAL INTERIM STATUS REQUIREMENTS AND TSD REQUIREMENTS

Yes   No   N/A   Remark #

### Subpart B: General Facility Standards

1. The operator has a detailed chemical and physical analysis of the waste material containing all of the information which must be known to properly treat or store the waste as required by Section 265.13(a) [3745-65-13(A)(1)]

\_\_\_\_\_ X \_\_\_\_\_ No. 1

2. The operator has a written waste analysis plan which describes analytical parameters, test methods, sampling methods, testing frequency and responses to any process changes that may affect the character of the waste. (Section 265.13(b)) [3745-65-13(B)]

\_\_\_\_\_ X \_\_\_\_\_ No. 2

3. a) Would physical contact with the waste structures or equipment injure unknowing/unauthorized persons or livestock entering the facility? (265.14(a)(1)) [3745-65-14(A)(1)]

X \_\_\_\_\_ \_\_\_\_\_

b) Would disturbance of the waste cause a violation of the hazardous waste regulations? (265.14(a)(2)) [3745-65-14(A)(2)]

X \_\_\_\_\_ \_\_\_\_\_

IF BOTH 3a AND 3b ARE "NO", MARK QUESTIONS 4 AND 5 "NOT APPLICABLE".

4. The facility has -

a) A 24-hour surveillance system, or

\_\_\_\_\_ X \_\_\_\_\_ No. 3

b) An artificial or natural barrier and a means to control entry at all times (265.14(b)(2)). [3745-65-14(B)(2)(a and b)]

\_\_\_\_\_ X \_\_\_\_\_ No. 3

5. The facility has a sign "Danger-Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations as necessary. (265-14(c)) [3745-65-14(C)]

X \_\_\_\_\_ \_\_\_\_\_

1. There are several drums on site for which identification information is missing. See waste inventory from 1987.
2. The waste analysis plan was not available at the facility during the inspection.
3. Mr. Reeb visits the facility approximately once every 1 to 2 weeks for inspections. The condition of the fence has further deteriorated. On the front western part of the fence where a tree fell on the fence repairs are not complete; the top strands of barbed wire require repair. In front near the east end of the facility there is a hole of approximately 4 square feet where no fence exists. It is believed this area has always been there however vegetation had grown up around the hole concealing it.

GENERAL FACILITY STANDARDS - 1

Revised 12/84

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. a) The operator has developed and followed a comprehensive, written inspection plan and documented the inspections, malfunctions and any remedial actions taken in an operating record log which is kept for at least three years. (265.15) [3745-65-15]	<u>      </u>	<u>  X  </u>	<u>      </u>	<u>No. 4</u>
b) Areas subject to spills (i.e., loading and unloading areas, container storage areas, etc.) are inspected daily when in use and according to other applicable regulations when not actively in use. (265.15(b)(4)) [3745-65-15(B)(4)]	<u>  X  </u>	<u>      </u>	<u>      </u>	<u>      </u>
7. The facility has provided a Personnel Training Program in compliance with Section 265.16(a)(b)(c) including instruction in safe equipment operation and emergency response procedures, training new employees within 6 months and providing an annual training program refresher course. [3745-65-16(A)(B)(C)]	<u>  X  </u>	<u>      </u>	<u>      </u>	<u>      </u>
8. The facility keeps all records required by Section 265.16(d)(e) including written job titles, job descriptions and documented employee training records. [3745-65-16(D)(E)]	<u>      </u>	<u>  X  </u>	<u>      </u>	<u>No. 5</u>
9. If required due to the actual hazards associated with Ignitable, Reactive or incompatible waste materials, the facility meets the following requirements: (Section 265.17) [3745-65-17]				
a) Protection from sources of ignition.	<u>  X  </u>	<u>      </u>	<u>      </u>	<u>      </u>
b) Physical separation of incompatible waste materials.	<u>  X  </u>	<u>      </u>	<u>      </u>	<u>      </u>
c) "No Smoking" or "No Open Flames" signs near areas where Ignitable or Reactive wastes are handled.	<u>  X  </u>	<u>      </u>	<u>      </u>	<u>      </u>
d) Any comingling of waste materials is done in a controlled, safe manner as prescribed by Section 265.17(b). [3745-65-17(B)]	<u>  X  </u>	<u>      </u>	<u>      </u>	<u>      </u>
4. The inspection plan was not available during the inspection. Inspections were not performed at the required frequency. Five periods ranging in length from 9 to 17 days elapsed between some inspections.				
5. There was no record of annual refresher training to have been received by Mr. Reeb.				

# RCRA INTERIM STATUS INSPECTION FORM

## Subpart C: Preparedness and Prevention

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Has there been a fire, explosion or non-planned release of hazardous waste at this facility? (265.31) [3745-65-31]	<u>X</u>	<u>      </u>	<u>      </u>	<u>No. 1</u>
2. If required due to actual hazards associated with the waste material, the facility has the following equipment: (265.32) [3745-65-32(A)(B)(C)(D)]				
a) Internal alarm system.	<u>      </u>	<u>X</u>	<u>      </u>	<u>No. 2</u>
b) Access to telephone, radio or other device for summoning emergency assistance.	<u>      </u>	<u>X</u>	<u>      </u>	<u>No. 2</u>
c) Portable fire control equipment.	<u>      </u>	<u>X</u>	<u>      </u>	<u>No. 2</u>
d) Water of adequate volume and pressure via hoses sprinkler, foamers or sprayers.	<u>      </u>	<u>X</u>	<u>      </u>	<u>No. 2</u>
3. All required safety, fire and communications equipment is tested and maintained as necessary; testing and maintenance are documented. (265.33) [3745-65-33]	<u>      </u>	<u>X</u>	<u>      </u>	<u>No. 2</u>
4. If required due to the actual hazards associated with the waste material, personnel have immediate access to an emergency communication device during times when hazardous waste is being physically handled. (265.34) [3745-65-34]	<u>      </u>	<u>X</u>	<u>      </u>	<u>No. 2</u>
5. If required due to the actual hazards associated with the waste material, adequate aisle space to allow unobstructed movement or emergency or spill control equipment is maintained. (265.35) [3745-65-35]	<u>      </u>	<u>X</u>	<u>      </u>	<u>No. 3</u>
6. If required due to the actual hazards associated with the waste material, the facility has attempted to make appropriate arrangements with local emergency service authorities to familiarize them with the possible hazards and the facility layout. (265.37(a)) [3745-65-37(A)]	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
7. Where state or local emergency service authorities have declined to enter into any proposed special arrangements or agreements the refusal has been documented. (265.37(b)) [3745-65-37(B)]	<u>      </u>	<u>      </u>	<u>      </u>	<u>Intend to when needed</u>

1. Refer to RCRA Facility Assessment (fire in dumpster, May, 1985).
2. One fire extinguisher was missing (near the office); the other two have not been recharged since 1985. The telephone, water and electric have all been disconnected.
3. No aisle exists between a double row of drums and the office/lab.

# RCRA INTERIM STATUS INSPECTION FORM

Yes    No    N/A    Remark #

## Subpart D: Contingency and Emergency

1. The facility has a written Contingency Plan designed to minimize hazards from fire, explosions or unplanned releases of hazardous wastes (265.51) [3745-65-52(A)(B)(C)(D)(E)] and contains the following components:
  - a) Actions to be taken by personnel in the event of an emergency incident. X
  - b) Arrangements or agreements with local or state emergency authorities. X
  - c) Names, addresses and telephone numbers of all persons qualified to act as emergency coordinator. X
  - d) A list of all emergency equipment including location, physical description and outline of capabilities. X
  - e) If required due to the actual hazards associated with the waste(s) handled, an evacuation plan for facility personnel. (265.51(f)) [3745-65-52(F)] X
2. A copy of the Contingency Plan and any plan revisions is maintained on-site and has been submitted to all local and state emergency service authorities that might be required to participate in the execution of the plan. (265.53) [3745-65-53(A)(B)] X
3. The plan is revised in response to facility, equipment and personnel changes or failure of the plan. (265.54) [3745-65-54]         X            No. 1
4. An emergency coordinator is designated at all times (on-site or on-call) is familiar with all aspects of site operation and emergency procedures and has the authority to implement all aspects of the Contingency Plan. (265.56) [3745-65-55] X
5. If an emergency situation has occurred, the emergency coordinator has implemented all or part of the Contingency Plan and has taken all of the actions and made all of the notifications deemed necessary under Sections 265.56(a-j). [3745-65-56(A-J)]         X            No. 2
1. The plan has not been revised to reflect GSI's present operating status, and that aside from the weekly inspections there is no way of detecting an emergency except by a passer by or nearby resident. If an emergency was discovered by inspection, there is no way of summoning off site emergency services except by going to a neighbor's house.
2. See report on 1985 dumpster fire.

# RCRA INTERIM STATUS INSPECTION FORM

Yes No N/A Remark #

## Subpart E: Manifests/Records/Reporting

**NOTE:** THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH ON-SITE AND OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

1. The operator maintains a written operating record at his facility as required by Section 265.73 [3745-65-73(A)] which contains the following information:

- a) Description and quantity of each hazardous waste treated, stored or disposed of within the facility and the date(s) and method(s) pertinent to such treatment, storage or disposal. (265.73(b)(1)) [3745-65-73(B)(1)]
- b) Common name, EPA Hazardous Waste Identification Number and physical state (liquid, solid, gas) of the waste(s).
- c) The estimated (or actual) weight, volume or density of the waste material(s).
- d) A description of the method(s) used to treat, store or dispose of the waste(s) using the EPA Handling Codes listed in 45 FR 33252 (May 19, 1980).
- e) The present physical location of each hazardous waste within the facility.
- f) FOR DISPOSAL FACILITIES, the location and quantity of each hazardous waste recorded on a map of the facility and cross-references to any pertinent manifest document number(s). (265.73(b)(2)) [3745-65-73(B)(2)]
- g) Records of any waste analyses and trial tests required to be performed.
- h) Records of the inspections required under Section 265.15 [3745.65.14] (General Inspection Requirements - Subpart B).
- i) Records of any monitoring, testing or analytical data required under other Subparts as referenced by Section 265.73(b)(6). [3745-65-73(B)(6)]
- j) Records of Closure cost estimates and Post-Closure (DISPOSAL ONLY) cost estimates required under Subpart G.

X			
X			
X			
X			
X			
		X	
X			
	X		No. 1
		X	
		X	



# RCRA INTERIM STATUS INSPECTION FORM

2. The operators has submitted an annual Treatment-Storage-Disposal Operating Report (by March 1) containing all of the operating information required under Section 265.75. [3745-65-75]

Yes	No	N/A	Remark #
	X		No. 2

**NOTE:** THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO ONLY OFF-SITE TREATMENT, STORAGE AND DISPOSAL FACILITIES.

3. Manifests received by the facility are signed and dated; one copy is given to the transporter, one copy is sent to the generator within 30 days and one copy is kept for at least 3 years. (265.71) [3745-65-71(A)]

		X	No. 3
--	--	---	-------

- a) If shipping papers are used in lieu of manifests (bulk shipments, etc.) the same requirements are met. (265.71(b)) [3745-65-71(B)]

		X	No. 3
--	--	---	-------

- b) Any significant discrepancies in the manifest, as defined in Section 265.72(a) [3745-65-72(A)] are noted in writing on the manifest document. (265.71(a)(2)) [3745-65-71(A)(2)]

Intend to when needed

4. Any manifest discrepancies have been reconciled within 15 days as required by Section 265.72(b) or the operator has submitted the required information to the Regional Administrator/Director. [3745-65-72(B)]

Intend to when needed

5. If the facility has accepted any unmanifested hazardous wastes from off-site sources (except from small quantity generators) for treatment, storage, or disposal an unmanifested waste report containing all the information required by Section 265.76 has been submitted to the Regional Administrator/Director within 15 days. [3745-65-76(A)]

Intend to when needed

1. See inspection deficiencies for container and tank inspections.
2. OEPA has no record of receiving an Annual Facility Report for 1987.
3. GSI has not received or shipped any wastes since August, 1986.

RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

Subpart G: Closure and Post-Closure

**NOTE:** THE FOLLOWING REQUIREMENTS ARE APPLICABLE TO BOTH DISPOSAL AND NON-DISPOSAL FACILITIES.

- |  |               |               |               |               |
|--|---------------|---------------|---------------|---------------|
| 1. A written Closure Plan is on file at the facility and contains the following elements: (Section 265.112) [3745-66-12]   | <u>X</u>      | <u>      </u> | <u>      </u> | <u>      </u> |
| a) A description of how and when the facility will be closed.<br>(265.112(a)(1)) [3745-66-12(A)(1)]  | <u>X</u>      | <u>      </u> | <u>      </u> | <u>      </u> |
| b) A description of how any of the <u>applicable</u> closure requirements in other Subparts of Section 265 [3745-66] (Tanks, Surface Impoundments, Landfill, etc.) will be carried out.  | <u>X</u>      | <u>      </u> | <u>      </u> | <u>      </u> |
| c) An estimate of the maximum amount of hazardous wastes being treated or in storage at the facility. (NOTE: Maximum inventory should agree with the permit.)  | <u>X</u>      | <u>      </u> | <u>      </u> | <u>      </u> |
| d) A description of steps taken to decontaminate facility equipment.   | <u>      </u> | <u>      </u> | <u>      </u> | <u>      </u> |
| e) The year closure is expected to begin and a schedule for the various phases of closure.   | <u>      </u> | <u>X</u>      | <u>      </u> | <u>No. 1</u>  |
| 2. The Closure Plan has been amended within 60 days in response to any changes in facility design, processes or closure dates. (265.112(4)(B)) [3745-66-12(B)]   | <u>      </u> | <u>      </u> | <u>X</u>      | <u>      </u> |
| 3. The Closure Plan has been submitted to the Regional Administrator/Director 180 days prior to beginning the Closure process. (265.112(4)(C)) [3745-66-12(C)]   | <u>      </u> | <u>X</u>      | <u>      </u> | <u>No. 2</u>  |
| 1. The expected date of closure is not in the plan.  |               |               |               |               |
| 2. The closure plan on site was from 11/15/84 which was a partial closure plan for the tanks. The plan does not reflect the fact that U.S. EPA required GSI to submit a full closure plan in July, 1987. Less than 50 percent of the partial closure was ever completed prior to the ceasing of operations at GSI in August, 1986. |               |               |               |               |

RCRA INTERIM STATUS INSPECTION FORM

Yes   No   N/A   Remark #

Subpart H: Financial Requirements

1. The owner or operator of the facility has established financial assurance for closure by use of one of the following: (265.143) [3745-66-43]

a) A closure trust fund, or

—   X   —   No. 1

b) A surety bond, or

—   X   —   —

c) A closure letter of credit, or

—   X   —   —

d) A combination of financial mechanisms.

—   X   —   —

2. A written cost estimate for closure of the facility (as specified in the closure plan) is available. How much is it?

—   X   —   No. 2

3. When was the most recent estimate made?

X   —   —   1984

4. A written cost estimate for post closure care of the facility (if applicable) is available. How much is it?

—   —   —   —

5. When was the most recent estimate made?

—   —   —   —

REMARKS, GENERAL INTERIM STATUS REQUIREMENTS

1. GSI is in violation of financial assurance regulations.

2. A revised closure cost has not been added to the plan. The present closure cost is out dated.

**RCRA INTERIM STATUS INSPECTION FORM****Subpart I: Management of Containers**

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. Hazardous wastes are stored in containers which are:				
a) Closed (265.173) [3745-66-73(A)]	—	<u>X</u>	—	<u>No. 1</u>
b) In good physical condition (265.171) [3745-66-71]	—	<u>X</u>	—	<u>No. 1</u>
c) Compatible with the wastes stored in them (265.172) [3745-66-72]	<u>X</u>	—	—	—
2. Containers are stored closed except when it is necessary to add or remove wastes. (265.173(a)) [3745-66-73(A)]	—	<u>X</u>	—	<u>No. 1</u>
3. Hazardous waste containers are stored, handled and opened in a manner which prevents container rupture or leakage. (265.173(b)) [3745-66-73(B)]	—	<u>X</u>	—	<u>No. 1</u>
4. The area where containers are stored is inspected for evidence of leaks or corrosion at least weekly and such inspections are documented. (265.174) [3745-66-74]	—	<u>X</u>	—	<u>No. 2</u>
5. Containers holding Ignitable or Reactive waste(s) are located at least 50 feet (15 meters) from the property line and the general requirements for handling such wastes in Section 265.17 (physical separation, signs and safety) are met (265.176) [3745-66-76]	—	<u>X</u>	—	<u>No. 3</u>
6. Containers holding hazardous wastes are stored separate from other materials which may interact with the waste in a hazardous manner. (265.177(c)) [3745-66-77(C)]	<u>X</u>	—	—	—
1. One container had a lid which had rusted through and dropped a few inches into the drum. Many of the drums are in a state of decay. Six were found to have pin hole leaks. Many drums are very rusty. Due to the poor condition of some of the drums it may not be acceptable to stack them 3 drums high anymore. On the other hand moving the drums around the facility unless it is for overpacking or to be sent to a treatment or disposal facility may create worse conditions should the drums sustain further damage during handling.				
2. There were 8 periods of time since May of 1987 where 9 to 17 days passed before another inspection was conducted.				
3. Ignitable waste are stored inside the building approximately 35 feet from a public right of way.				

RCRA INTERIM STATUS INSPECTION FORM

Subpart J: Storage in Tanks

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
1. The tank(s) are operated in compliance with the safety requirements of Sections 265.17 and 265.192(b) [3745-66-92(B)] and are equipped with a waste-feed cutoff or bypass system as required in Section 265.192(d) [3745-66-92(D)].	<u>X</u>	<u>      </u>	<u>      </u>	<u>No. 1</u>
2. Uncovered tanks have at least 2 feet (60 cm.) of freeboard unless they are equipped with a spill containment system with a capacity that equals or exceeds the volume that 2 feet of freeboard would otherwise provide. (265.192(c)) [3745-66-92(C)]	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
3. Daily inspections are made of all systems pertinent to the proper operation of the tank: discharge and cutoff, monitoring equipment, tank level and freeboard. (265.194) [3745-66-94(A)(B)(C)]	<u>      </u>	<u>      </u>	<u>X</u>	<u>      </u>
4. Weekly inspections are made of all tank construction materials and containment structures. (265.194) [3745-66-94(D)(E)]	<u>      </u>	<u>X</u>	<u>      </u>	<u>No. 2</u>
5. Whenever tanks are used to treat or store wastes substantially different from previous wastes or when substantially different treatment processes are used in the tank, the facility has insured the safety of such changes by one or both of the following methods: (265.193(a)) [3745-66-93(A)(B)]				
a) A complete waste analysis plus bench scale tests or pilot tests were conducted prior to implementing the proposed changes and all data is on file in the facility operating record.	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
b) Written, documented information on similar storage or treatment process changes was obtained prior to implementing the proposed changes and all documentation is on file in the facility operating record.	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
1. Tanks are disconnected and not sealed to the environment. Two tank lids could be moved by hand. One tank had already filled with water during a rain event which flooded the tank excavation with water.				
2. During eight time periods since May, 1987 9 to 17 days passed between inspections.				

# RCRA INTERIM STATUS INSPECTION FORM

	<u>Yes</u>	<u>No</u>	<u>N/A</u>	<u>Remark #</u>
6. With the exception of emergency situations, whenever Ignitable or Reactive wastes are placed in tanks the facility has insured the safety of the operation by one or both of the following methods: (265.198(a)) [3745-66-98(A)]				
a) The waste is treated immediately before or after being placed in the tank so that it is no longer Ignitable or Reactive and such treatment is done in compliance with the safety requirements of Section 265.17(b) [3745-65-17(B)].	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
b) The waste is stored or treated under protected conditions eliminating the possibility of ignition or reaction.	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
7. Covered tanks used to treat or store Ignitable or Reactive wastes are in compliance with NFPA buffer zone requirements (Flammable and Combustible Code 1977). (265.198(b)) [3745-66-98(B)]	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
8. Incompatible waste materials are placed in the same tanks or put in contaminated tanks only under completely controlled and safe conditions as specified in Section 265.17(b). (265.199) [3745-66-99(A)(B)]	<u>X</u>	<u>      </u>	<u>      </u>	<u>      </u>
9. Whenever a tank is permanently taken out of service or upon closure of the facility all hazardous wastes and residues are removed and properly disposed of. (265.197) [3745-66-97)]	<u>      </u>	<u>X</u>	<u>      </u>	<u>No. 3</u>
3. Closure of the tank storage area began in 1986. However to date the five tanks left in the ground still have hazardous waste in them.				

# RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Granville Solvents, Inc.

U.S. EPA I.D. No.: OHD 004 495 412

Street: Palmer Lane, P.O. Box 95

City: Granville State: OH Zip Code: 43023

Telephone: (614) 268-0916 (Americlean Systems, Inc.)

Operator: John Reeb

Street: Same as above

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Owner: \_\_\_\_\_

Street: Same as owner's

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip Code: \_\_\_\_\_

Telephone: \_\_\_\_\_

Inspection Date: 5/3/88 Time: 9:00A Weather Conditions: SUNNY 55°F

	<u>Name</u>	<u>Affiliation</u>	<u>Telephone</u>
Inspectors:	<u>William Schneider</u>	<u>CEPA</u>	<u>(614) 644-2055</u>
	<u>Lundy Adelsberger</u>	<u>CEPA</u>	<u>" " "</u>

Facility Representatives: John Reeb Owner/operator

	<u>RCRA Status</u>	<u>E-Solvent</u>	<u>LDR Status</u> <u>California List</u>
Generator	_____	_____	_____
Transporter	_____	_____	_____
Treater	_____	_____	_____
Storer	<u>✓</u>	<u>✓</u>	_____
Disposer	_____	_____	_____

### INSPECTION SUMMARY

- It should be noted that all the wastes presently on site have been stored since <sup>(ON)</sup> or before August 15, 1986 when a court ordered GSI to cease operation.
- Status has not changed since last inspection in May, 1987.
- These wastes are still being stored pending closure of the facility.
- Since GSI has not generated hazardous waste in 2 yrs. no generator form was prepared.



# **RCRA LAND DISPOSAL RESTRICTION INSPECTION APPLICABILITY CHECKLIST**

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
<b>A.</b>	<b><u>F-Solvent Wastes</u></b>					
1.	F001	_____	_____	<input checked="" type="checkbox"/>	_____	_____
2.	F002	_____	_____	<input checked="" type="checkbox"/>	_____	_____
3.	F003	_____	_____	<input checked="" type="checkbox"/>	_____	_____
4.	F004	_____	_____	<input checked="" type="checkbox"/>	_____	_____
5.	F005	_____	_____	<input checked="" type="checkbox"/>	_____	_____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

## **B. California List Wastes**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	_____	_____	_____	_____	_____
Cadmium	100 mg/L	_____	_____	_____	_____	_____
Chromium VI	500 mg/L	_____	_____	_____	_____	_____
Lead	500 mg/L	_____	_____	_____	_____	_____
Mercury	20 mg/L	_____	_____	_____	_____	_____
Nickel	134 mg/L	_____	_____	_____	_____	_____
Selenium	100 mg/L	_____	_____	_____	_____	_____
Thallium	130 mg/L	_____	_____	_____	_____	_____

*UNKNOWN*

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
_____	_____	_____	_____	_____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

_____	_____	_____	_____	_____
-------	-------	-------	-------	-------

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm _____	_____	_____	_____	_____
--------------	-------	-------	-------	-------

500 ppm _____	_____	_____	_____	_____
---------------	-------	-------	-------	-------

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

\_\_\_\_\_ Yes      \_\_\_\_\_ No      ☒ NA

If yes, state reasons for mixing:

\_\_\_\_\_

\_\_\_\_\_

5. Liquid hazardous waste that is primarily water and that contains HOCs greater than or equal to 1,000 mg/L (dilute HOC wastewater) and less than 10,000 mg/L

_____	_____	<input checked="" type="checkbox"/>	_____	_____
-------	-------	-------------------------------------	-------	-------

*It is possible that one underground tank which contained solvent and then filled with rain water may fall into this category*

Note: The prohibitions of 268.32(a)(3) and (e) do not apply if the HOC waste is also subject to the solvent restrictions of 268 Subpart C or a specific HOC.

TRANS

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TRANSPORTER CHECKLIST

TRANSPORTER REQUIREMENTS

- A. Does the transporter accumulate waste for more than 10 days [268.50(A)(3)]?

☒ Yes ☐ No

If yes, check the appropriate regulatory status

☒ Interim status for storage

☐ RCRA permit for storage

If no, describe inventory controls to ensure that wastes are not stored for more than 10 days: \_\_\_\_\_

- B. Does the transporter mix, combine, or recontainerize wastes?

☒ Yes ☐ No

- C. Is the waste treated in an exempt treatment process on-site?

☐ Yes ☒ No

Grawville Solvents no longer has its Transporter license

Prior to ceasing operations mixing consolidating & recontainerizing were conducted.

## RCRA LAND DISPOSAL RESTRICTION INSPECTION

## TSD CHECKLIST

## TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

o F-solvent ☐ Yes ☒ No ☐ NA

o California List ☐ Yes ☒ No ☐ NA

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

☐ Yes ☒ No

*Some drums on site have UNKNOWN*

a. What date was the waste analysis plan last revised? UNKNOWN

b. Are analyses conducted on-site or off-site?

☐ On-site ☐ Off-site

Identify off-site lab: \_\_\_\_\_

c. Is F-solvent waste analyzed using TCLP?

☐ Yes ☐ No ☐ NA

d. Describe the frequency of sampling: \_\_\_\_\_

e. Describe procedures used to identify manifest discrepancies: \_\_\_\_\_

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

☒ Yes ☐ No

*Granville  
Solvents ceased  
operation 8-15-86  
under court order.  
These activities  
do not occur.*

**B. Storage (268.50)**

1. Are restricted wastes stored on-site?

☒ Yes ☐ No

If no, go to C, Treatment in Surface Impoundments.

2. If yes, check the appropriate method.

☒ Tanks  
☒ Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

☐ Yes ☒ No ☐ NA

All drums are not marked to indicate  
contents and accumulation date

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

☒ Yes ☐ No

5. Do operating records agree with container labeling?

☒ Yes ☐ No ☐ NA

6. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

☒ Yes ☐ No ☐ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

☐ Yes ☒ No

If yes, state how: \_\_\_\_\_

7. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

\_\_\_ Yes    ☒ No    \_\_\_ NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

\_\_\_ Yes    ☒ No

8. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

☒ Yes    \_\_\_ No    \_\_\_ NA

maintained in the operating log.

**C. Treatment**

1. Does the facility treat restricted wastes other than in surface impoundments?

\_\_\_ Yes    \_\_\_ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue from all treatment processes is less than treatment standards [268.7(b)]?

\_\_\_ Yes    \_\_\_ No

4. Describe frequency of testing treatment residuals:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

5. Is dilution used as a substitute for treatment?

\_\_\_ Yes    \_\_\_ No